PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Supreme Corporation
16500 County Road 38
Goshen, Indiana 46528

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-6046-00103	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 19, 2001 Expiration Date: April 19, 2006

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary heavy truck and bus painting and parts manufacturing plant.

Responsible Official:	Omer Kropf, President
Source Address:	16500 County Road 38, Goshen, IN 46528
Mailing Address:	P. O. Box 463, Goshen, IN 46526
Phone Number:	219 / 642 - 4888
SIC Code:	3713, 3089
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) A spray/bake booth, identified as H-1, constructed June 1991, which may coat metal or fiberglass reinforced plastic (FRP) surfaces, with a maximum production capacity of 1.66 units per hour, equipped with a dry filter for particulate matter (PM) control, equipped with a 32,000 acfm exhaust fan, and exhausting to stack SV-H-1

(b) A bake booth, identified as H-4, constructed November 4, 1999, which serves as an additional bake booth for sprayed parts from spray/bake booth H-1, with a rated heat input of 1.2 MMBtu per hour, with no controls, and exhausting to stack SV-H-4

(c) Two spray/bake booths, identified as H-2 and H-3, constructed May 28, 1997, which may coat metal or FRP surfaces, each with a maximum production capacity of 0.375 units per hour, each equipped with dry filters for particulate matter (PM) control, each equipped with a 32,000 acfm exhaust fan, and exhausting to stacks SV-H-2 and SV-H-3

(d) An HVLP paint area, identified as A-1, constructed in June 1991, with a maximum production capacity of 3.1 metal truck rear-end parts per hour, equipped with dry filters for PM control, and exhausting to stack SV-A-1

(e) A base coat booth, identified as I-1, constructed January 6, 1995, which may coat metal or FRP surfaces, with a maximum production capacity of 0.60 units/hour, equipped with a dry filter for PM overspray control, and exhausting to stack SV-I-1

(f) A spray/bake booth, identified as I-2, constructed January 6, 1995, which may coat metal or FRP surfaces, with a maximum production capacity of 0.60 units per hour, and a maximum heat input capacity of 1.0 MMBtu per hour, equipped with a down draft dry filter system for PM overspray control, and exhausting through stack SV-I-2

(g) Two HVLP spray paint areas, identified as 1-1 and 1-2, constructed July 25, 1991, each with a maximum production capacity of 1.33 metal rear parts/hour, each equipped with a dry filter for PM control, and exhausting through stacks SV-1-1 and SV-1-2

(h) An undercoating air assisted spray booth, identified as 1-4, constructed July 25, 1991, with a maximum production capacity of 1.33 metal frames per hour, equipped with a dry filter for PM control, and exhausting through stack SV-1-4

(i) A spray paint booth, identified as P-6, constructed July 25, 1991, with a maximum capacity of 0.88 metal or FRP units/hour, equipped with a dry filter for PM control, and exhausting through stack SV-P-6

(j) A spray paint area, identified as P-7, constructed July 25, 1991, with a maximum capacity of 16.66 metal parts/hour, equipped with a dry filter for PM control, and exhausting through stack SV-P-7

(k) A surface touch-up spray facility, identified as GM-2, constructed in 1987, with a maximum production capacity of 1.33 metal units/hour, with no controls, and exhausting within the building

(l) A spray booth identified as 1-3, constructed in January 1991, with a maximum production capacity of 14 metal units/day, equipped with a dry filter for PM control, and exhausting through stack SV-1-3

(m) A spray area, identified as 1-6, constructed in January 1991, with a maximum production capacity of 1.33 metal units/hour, equipped with no controls, and exhausting within the building

(n) A spray area, identified as 1-7, constructed in January 1991, with a maximum production capacity of 1.33 metal units/hour, with no controls, and exhausting within the building

(o) A portable undercoating station, identified as 1-8, constructed in January 1991, with a maximum production capacity of 14 metal units/day, with no controls, and exhausting within the building

(p) An undercoat air assisted spray booth, identified as 5-10, constructed in August 1985, with a maximum production capacity of 0.55 metal units/hour, equipped with dry filters for PM control, and exhausting through stack SV-5-10

(q) An undercoat air assisted spray booth, identified as 5-12, constructed in August 1985, with a maximum production capacity of 0.55 metal units/hour equipped with a dry filter for PM control, and exhausting through stack SV-5-12

(r) A spray booth, identified as 5-13, constructed in August 1985, with a maximum production capacity of 5 metal units/day, equipped with dry filter banks for PM control, and exhausting through stack SV-5-13

(s) A spray paint area, identified as N-2, constructed in June 1991, with a maximum capacity of 1.11 metal units/hour, equipped with dry filter banks for PM control, and exhausting to stack SV-N-2

(t) A spray undercoating area, identified as A-2, constructed in June 1991, with a maximum capacity of 12 metal units/day, with no emission control, and exhausting within the building

(u) An air assisted undercoating booth, identified as N-1, constructed in June 1991, with a maximum capacity of 1.11 metal units/hour, equipped with a dry filter for PM control, and exhausting to stack SV-N-1

(v) A glue lamination air assisted spray facility, identified as 2-15, constructed July 25, 1991, with a maximum production capacity of 0.687 units per hour, equipped with no controls and exhausting within the building

(w) Four Safety Kleen gun cleaners, each equipped with remote solvent reservoirs, identified as SC-1, SC-2, SC-3, and SC-4, each using a maximum of 5 gallons of solvent per week, with no controls, and exhausting within the building

(x) Clean-up solvent processes for the source, with a maximum total usage of 6.5 gal of solvent per hour

(y) A plastic pultrusion machine, identified as M-1, constructed in February 1991, with a maximum capacity of 3.33 parts/hour, equipped with no controls, and exhausting within the building

(z) A reciprocator, performing gel coating and resin flow coating lamination, identified as M-2, constructed in February 1991, with a maximum production of 4.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-2

(aa) A reciprocator, performing gel coating and resin flow coating lamination, identified as M-4, constructed in February 1991, with a maximum production of 0.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-4

(bb) A portable gelcoat gun, identified as M-3, constructed in February 1991, with a maximum production of 4.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-3

(cc) Two portable gelcoat guns, identified as M-5 and M-9, constructed in February 1991, each with a maximum production of 0.67 parts/hour, each equipped with a dry filter bank for PM control, and exhausting through stacks SV-M-5 and SV-M-9

(dd) Three portable chop/resin guns, identified as M-6, M-7, and M-8, constructed in February 1991, each with a maximum production of 0.67 parts/hour, each equipped with a dry filter bank for PM control, and exhausting through stack SV-M-6, SV-M-7, and SV-M-8

(ee) A FRP mold department, identified as B-1, constructed in August 1980, with a maximum capacity of 0.004 molds /hour, with no emission control, and exhausting to stack SV-B-1

(ff) A white resin air assisted spray gun, identified as B-2(a), constructed in August 1990, with a maximum capacity of 0.004 molds/hour, equipped with a dry filter for PM control, and exhausting to stack SV-B-2

(gg) A Tru-green mold repair spray gun, identified as B-2(b), constructed in August 1990, with a maximum capacity of 1.33 parts/hour, equipped with a dry filter for PM control, and exhausting to stack SV-B-2

(hh) Two repair/touch-up FRP facilities, identified as N-3(a) and N-3(b), constructed in August 1987, each with a maximum capacity of 0.888 parts/hour, with no emission control, and exhausting within the building

(ii) Several fiberglass touch-up areas which operate as part of FRP production lines, using Binks 115 guns with no emission controls and exhausting within the buildings

(jj) Two bulk resin tanks, identified as M-13(a) and M-13(b), constructed prior to 1981, each with a maximum capacity of 40,000 gallons, with no emission control and exhausting through safety valves

(kk) A fiberglass reinforced plastic (FRP) cutting facility, identified as 7-1, constructed November 1990, with a maximum production of 0.65 lb. of grinding dust/hour, equipped with a cyclone for dust collection, and exhausting through stack SV-7-1

(ll) Grinder/buffer facilities, identified as M-10, constructed in February 1991, with a maximum capacity of 12 units/hour, equipped with dry filters for control and exhausting through stack SV-M-10

(mm) A woodworking facility, identified as N-4, constructed prior to 1987, with a maximum production capacity of 18.54 lb raw material/hour, equipped with a cyclone for dust collection, and exhausting through stack SV-N4

(nn) A woodworking facility, identified as 5-14, constructed July 25, 1991, with a maximum production capacity of 18.54 lb of raw product/hour equipped with a cyclone for sawdust collection, and exhausting through stack SV-5-14

(oo) A woodworking facility, identified as 1-9, constructed July 25, 1991, with a maximum capacity of 18.54 lb of raw product/hour, equipped with a cyclone for sawdust collection, and exhausting through stack SV-1-9

(pp) A woodworking facility, identified as Fleet Woodworking, consisting of a horizontal table saw, a cut-off saw, a radial arm saw, and a band saw, constructed July 1991, with a maximum production capacity of 504 boards per day, with a small drum cyclone/baghouse within the building for sawdust collecting, and exhausting within the building

(qq) Two waste wood furnaces, each with a wood storage silo, identified as 1-5 and M-12, constructed March 16, 1994, each of which have a maximum heat input capacity of 2.0 MMBtu per hour, and exhausting to stacks SV-1-5 and SV-M-12

(rr) Two parts washers, each equipped with remote solvent reservoirs, identified as PW-1 and PW-2, each using a maximum of 5 gallons of solvent per week, with no controls, and exhausting within the building

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

(a) This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment, including: [(326 IAC 6-3-2)Process Operations]

(A) Three stick welding stations, identified as Stick Fleet Welding, with a maximum production capacity of 6 pounds of welding stick per hour, with no controls, and exhausting within the building

(B) A four-torch oxyacetylene plasma cutting tool, identified as Fleet Torch, which has a cutting rate of 20 inches per minute, with no controls, and exhausting within the building

(C) Metal Inert Gas (MIG) welding stations, identified as MIG Welding, with a combined maximum production rate of 1080 pounds of welding wire per hour, with no controls and exhausting within the building

(D) Seventy-seven (77) MIG welding stations, sixteen (16) stick welding stations, twenty (20) oxyacetylene units, and a TIG welding station

(2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [(326 IAC 6-3-2)Process Operations]

(b) The requirement of CP 039-9080-00103, issued April 3, 1998, Condition D.1.1(b), requiring that any change or modification which may result in potential VOC emissions of 25 tons per year from the caulking operation shall require prior approval, is not applicable because pursuant to 326 IAC 2-7-1 (21), these caulking operations are classified as insignificant activities, and there are no permit conditions applicable to the insignificant caulking operations.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form, or its equivalent, either by mail or facsimile, to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Div., Regulation Development Branch-Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(A) A brief description of the change within the source;

(B) The date on which the change will occur;

(C) Any change in emissions; and

(D) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ, of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Compliance monitoring for new emission units or emission units added through a source

modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 30, 1996.

(b) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(e) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the

compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was

not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.

(1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.

(2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ, that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ, may extend the retesting deadline.

(c) IDEM, OAQ, reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by the applicable due date each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) A spray/bake booth, identified as H-1, constructed June 1991, which may coat metal or fiberglass reinforced plastic (FRP) surfaces, with a maximum production capacity of 1.66 units per hour, equipped with a dry filter for particulate matter (PM) control, equipped with a 32,000 acfm exhaust fan, and exhausting to stack SV-H-1

(b) A bake booth, identified as H-4, constructed November 4, 1999, which serves as an additional bake booth for sprayed parts from spray/bake booth H-1, with a rated heat input of 1.2 MMBtu per hour, with no controls, and exhausting to stack SV-H-4

(c) Two spray/bake booths, identified as H-2 and H-3, constructed May 28, 1997, which may coat metal or FRP surfaces, each with a maximum production capacity of 0.375 units per hour, each equipped with dry filters for particulate matter (PM) control, each equipped with a 32,000 acfm exhaust fan, and exhausting to stacks SV-H-2 and SV-H-3

(d) An HVLP paint area, identified as A-1, constructed in June 1991, with a maximum production capacity of 3.1 metal truck rear-end parts per hour, equipped with dry filters for PM control, and exhausting to stack SV-A-1

(e) A base coat booth, identified as I-1, constructed January 6, 1995, which may coat metal or FRP surfaces, with a maximum production capacity of 0.60 units/hour, equipped with a dry filter for PM overspray control, and exhausting to stack SV-I-1

(f) A spray/bake booth, identified as I-2, constructed January 6, 1995, which may coat metal or FRP surfaces, with a maximum production capacity of 0.60 units per hour, and a maximum heat input capacity of 1.0 MMBtu per hour, equipped with a down draft dry filter system for PM overspray control, and exhausting through stack SV-I-2

(g) Two HVLP spray paint areas, identified as 1-1 and 1-2, constructed July 25, 1991, each with a maximum production capacity of 1.33 metal rear parts/hour, each equipped with a dry filter for PM control, and exhausting through stacks SV-1-1 and SV-1-2

(h) An undercoating air assisted spray booth, identified as 1-4, constructed July 25, 1991, with a maximum production capacity of 1.33 metal frames per hour, equipped with a dry filter for PM control, and exhausting through stack SV-1-4

(i) A spray paint booth, identified as P-6, constructed July 25, 1991, with a maximum capacity of 0.88 metal or FRP units/hour, equipped with a dry filter for PM control, and exhausting through stack SV-P-6

(j) A spray paint area, identified as P-7, constructed July 25, 1991, with a maximum capacity of 16.66 metal parts/hour, equipped with a dry filter for PM control, and exhausting through stack SV-P-7

(k) A surface touch-up spray facility, identified as GM-2, constructed in 1987, with a maximum production capacity of 1.33 metal units/hour, with no controls, and exhausting within the building

(l) A spray booth identified as 1-3, constructed in January 1991, with a maximum production capacity of 14 metal units/day, equipped with a dry filter for PM control, and exhausting through stack SV-1-3

(m) A spray area, identified as 1-6, constructed in January 1991, with a maximum production capacity of 1.33 metal units/hour, equipped with no controls, and exhausting within the building

(n) A spray area, identified as 1-7, constructed in January 1991, with a maximum production capacity of 1.33 metal units/hour, with no controls, and exhausting within the building

(o) A portable undercoating station, identified as 1-8, constructed in January 1991, with a maximum production capacity of 14 metal units/day, with no controls, and exhausting within the building

(p) An undercoat air assisted spray booth, identified as 5-10, constructed in August 1985, with a maximum production capacity of 0.55 metal units/hour, equipped with dry filters for PM control, and exhausting through stack SV-5-10

(q) An undercoat air assisted spray booth, identified as 5-12, constructed in August 1985, with a maximum production capacity of 0.55 metal units/hour equipped with a dry filter for PM control, and exhausting through stack SV-5-12

(r) A spray booth, identified as 5-13, constructed in August 1985, with a maximum production capacity of 5 metal units/day, equipped with dry filter banks for PM control, and exhausting through stack SV-5-13

(s) A spray paint area, identified as N-2, constructed in June 1991, with a maximum capacity of 1.11 metal units/hour, equipped with dry filter banks for PM control, and exhausting to stack SV-N-2

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(t) A spray undercoating area, identified as A-2, constructed in June 1991, with a maximum capacity of 12 metal units/day, with no emission control, and exhausting within the building

(u) An air assisted undercoating booth, identified as N-1, constructed in June 1991, with a maximum capacity of 1.11 metal units/hour, equipped with a dry filter for PM control, and exhausting to stack SV-N-1

(v) A glue lamination air assisted spray facility, identified as 2-15, constructed July 25, 1991, with a maximum production capacity of 0.687 units per hour, equipped with no controls and exhausting within the building

(w) Four Safety Kleen gun cleaners, each equipped with remote solvent reservoirs, identified as SC-1, SC-2, SC-3, and SC-4, each using a maximum of 5 gallons of solvent per week, with no controls, and exhausting within the building

(x) Clean-up solvent processes for the source, with a maximum total usage of 6.5 gal of solvent per hour

(rr) Two parts washers, each equipped with remote solvent reservoirs, identified as PW-1 and PW-2, each using a maximum of 5 gallons of solvent per week, with no controls, and exhausting within the building

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

VOC usage from surface coating units H-1, H-2, H-3, A-1, I-1, I-2, 1-1, 1-2, 1-4, P-6, P-7, GM-2, 1-3, 1-6, 1-7, 1-8, 5-10, 5-12, 5-13, N-2, A-2, N-1, 2-15, cleaners SC-1,SC-2, SC-3, SC-4, PW-1, PW-2, and clean-up solvents, combined with VOC emissions from units M-1, M-2, M-4, M-3, M-5, M-9, M-6, M-7, M-8, B-1, B-2(a), B-2(b), N-3(a), N-3(b), Binks 115 areas, M-13(a) and M-13(b), shall be no more than 240 tons of VOC per 12 consecutive month period. This usage/emission limit, with the estimation that insignificant activities will emit < 10 tons of VOC per year, is required to limit the source's potential to emit VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

(a) The requirement from Significant Source Mod. 039-10937-00103, issued November 9, 1999, Condition D.1.1, that input VOC to bake booth H-4 and spray/bake booths H-1 H-2 and H-3 shall be limited to less than 40 tons per year, is not applicable because the permit was issued as a modification to CP 039-7321-00103, which contained a 39 ton/year limit for VOC in Condition 12, which is not applicable as described below in D.1.1 (b)

(b) The requirement from CP 039-7321-00103, issued May 28, 1997, Condition 12, that input volatile organic compounds (VOC) to spray/bake booths H-1, H-2, and H-3 shall be limited to 39 tons per year, is not applicable because the 39 ton limit was imposed so that the booths could be quickly constructed, as requested by the source, as a minor modification to an assumed major source. This Part 70 review included a comprehensive source review and emissions calculations, and has resulted in the source being limited to less than 250 tons of VOC per year. The limitation provides the source with flexibility to distribute allowable VOC emissions among the emission units without specific limits on individual units.

D.1.2 Emission Offset Minor Limit [326 IAC 2-3]

The requirement from CP 039-3362-00103, issued on January 6, 1995, Condition 6, that usage of VOC in booths I-1 and I-2 shall be limited to 39 tons per 365 day period rolled on a daily basis, so that Emission Offset Rules, 326 IAC 2-3, would not apply, is not applicable because the 39 ton limit was imposed for a minor modification to a major source under Emission Offset Rules, 326 IAC 2-3. Elkhart county is currently classified as a maintenance attainment county for ozone, so 326 IAC 2-3 will not apply.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these units and any control devices.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the facilities shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.5 Best Available Control Technology (BACT) [326 IAC 8-1-6]

(a) Pursuant to CP-039-7321-00103, issued May 28, 1997, BACT for spray/bake booths H-1, H-2, and H-3, when coating FRP substrates, shall be a combination of the use of high volume low pressure (HVLP) spray equipment and limits on the VOC content of 6.5 pounds of VOC per gallon of coating less water for basecoats and 5.1 pounds of VOC per gallon of coating less water for clearcoats. An exception to these VOC content limitations will be made for government work which requires the use of special coatings.

(b) Pursuant to CP-039-3362-00103, issued January 6, 1995, BACT for booths I-1 and I-2, when coating FRP substrates, shall be a combination of the use of high volume low pressure (HVLP) spray equipment and limits on the VOC content of 6.5 pounds of VOC per gallon of coating less water for basecoats and 5.1 pounds of VOC per gallon of coating less water for clearcoats.

(c) Input VOC to H-1, H-2, and H-3, when coating FRP substrates, shall be limited such that PTE VOC is less than 240 tons of VOC per 12 consecutive month period. Compliance with the source PSD limit of 240 tons of VOC per 12 consecutive month period will prove compliance with the H-1, H-2, and H-3 BACT limit of 240 tons per 12 consecutive month period.

(d) Input VOC to I-1 and I-2, when coating FRP substrates, shall be limited such that PTE VOC is less than 80 tons of VOC per 12 consecutive month period.

(e) Glue lamination spray unit 2-15 shall be limited to less than 25 tons of VOC per 12 consecutive month period by limiting input VOC such that:

8.25 lb VOC/gal adhesive * Gal. of adhesive used * (1 ton VOC/2000 lbs VOC) < 25 tons VOC/year

This limitation, based on VOC content of 8.25 lb VOC/gal. of adhesive, will prevent VOC emissions from lamination unit 2-15 being greater than 25 tons per 12 consecutive month period, so that BACT will not apply.

(f) Spray unit P-6 is not subject to 326 IAC 8-1-6 (BACT) due to the PTE VOC < 25 tons/year. Should PTE VOC exceed 25 tons/year, BACT would apply. Any change or modification which may increase the PTE VOC emissions from spray unit P-6 to 25 tons per year or more must be approved by the Office of Air Quality (OAQ) before such change may occur.

D.1.6 Miscellaneous Metal Coating [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings delivered to the applicators at spray booths/areas H-1, H-2, H-3, I-1, I-2, A-1, 1-1, 1-2, 1-4, P-6, P-7, GM-2, 1-3, 1-6, 1-7, 1-8, 5-10, 5-12, 5-13, N-2, A-2, and N-1, when applied to metal surfaces, shall be limited to 4.3 pounds of VOC per gallon of coating less water for clear coatings, and 3.5 pounds of VOC per gallon of coating less water for air dried, forced warm air dried or extreme performance coatings. If more than one emission limitation applies to a specific coating, then the least stringent emission limitation shall be applied.

(b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) The requirement from CP-039-9080, issued April 3, 1998, Condition D.1.1(a), that any change or modification which may result in actual VOC emissions of 15 pounds of VOC per day from the coatings used for the truck undercoating system shall require prior approval and shall be subject to the requirements of 326 IAC 8-2-9, is not applicable because truck undercoating system A-1 was permitted in CP-039-9080 as a water-based coating system. A-1 is currently using solvent-based coatings which contain 3.49 lbs of VOC/gallon of coating, less water, and has the PTE 195 lbs of VOC/day and 35.5 tons of VOC per year. Therefore, A-1 is subject to the requirements of 326 IAC 8-2-9, as described in Condition D.1.6(a) in this Part 70 permit.

D.1.7 Volatile Organic Compounds (VOC)

Pursuant to Source Modification 039-10937-00103, issued Nov. 9, 1999, and 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of Safety Kleen cleaners SC-1, SC-2, SC-3, and SC-4, and parts washers PW-1 and PW-2, shall:

(a) Equip the cleaners with a cover, or with a closed solvent recycling system which prevents solvent evaporation in much the same way as a cover prevents evaporation;

(b) Equip the cleaners with a facility for draining cleaned parts;

(c) Close the degreaser covers, or keep solvent within the closed recycling system, whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.5 (a), D.1.5(b) and D.1.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 VOC Emissions

Compliance with Conditions D.1.1, D.1.5(c), D.1.5(d) and D.1.5(e) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.11 Particulate Matter (PM)

Dry filters for PM control shall be in operation at all times the surface coating units are in operation. The water wash scrubbing system shall be in operation at all times unit I-2 is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.12 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from each of the surface coating booth stacks while the corresponding booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.13 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.5, and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily or monthly, as indicated below, and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1, D.1.5, and D.1.6.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.1.11 and D.1.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.5 (c), (d), and (e), shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(y) plastic pultrusion machine, identified as M-1, constructed in February 1991, with a maximum capacity of 3.33 parts/hour, equipped with no controls, and exhausting within the building

(z) A reciprocator, performing gel coating and resin flow coating lamination, identified as M-2, constructed in February 1991, with a maximum production of 4.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-2

(aa) A reciprocator, performing gel coating and resin flow coating lamination, identified as M-4, constructed in February 1991, with a maximum production of 0.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-4

(bb) A portable gelcoat gun, identified as M-3, constructed in February 1991, with a maximum production of 4.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-3

(cc) Two portable gelcoat guns, identified as M-5 and M-9, constructed in February 1991, each with a maximum production of 0.67 parts/hour, each equipped with a dry filter bank for PM control, and exhausting through stacks SV-M-5 and SV-M-9

(dd) Three portable chop/resin guns, identified as M-6, M-7, and M-8, constructed in February 1991, each with a maximum production of 0.67 parts/hour, each equipped with a dry filter bank for PM control, and exhausting through stack SV-M-6, SV-M-7, and SV-M-8

(ee) A FRP mold department, identified as B-1, constructed in August 1980, with a maximum capacity of 0.004 molds /hour, with no emission control, and exhausting to stack SV-B-1

(ff) A white resin air assisted spray gun, identified as B-2(a), constructed in August 1990, with a maximum capacity of 0.004 molds/hour, equipped with a dry filter for PM control, and exhausting to stack SV-B-2

(gg) A Tru-green mold repair spray gun, identified as B-2(b), constructed in August 1990, with a maximum capacity of 1.33 parts/hour, equipped with a dry filter for PM control, and exhausting to stack SV-B-2

(hh) Two repair/touch-up FRP facilities, identified as N-3(a) and N-3(b), constructed in August 1987, each with a maximum capacity of 0.888 parts/hour, with no emission control, and exhausting within the building

(ii) Several fiberglass touch-up areas which operate as part of FRP production lines, using Binks 115 guns with no emission controls and exhausting within the buildings

(jj) Two bulk resin tanks, identified as M-13(a) and M-13(b), constructed prior to 1981, each with a maximum capacity of 40,000 gallons, with no emission control and exhausting through safety valves

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

VOC emissions from FRP units M-1, M-2, M-4, M-3, M-5, M-9, M-6, M-7, M-8, B-1, B-2(a), B-2(b), N-3(a), N-3(b), Binks 115 areas, M-13(a) and M-13(b), combined with VOC usage from surface coating units H-1, H-2, H-3, A-1, I-1, I-2, 1-1, 1-2, 1-4, P-6, P-7, GM-2, 1-3, 1-6, 1-7, 1-8, 5-10, 5-12, 5-13, N-2, A-2, N-1, 2-15, cleaners SC-1,SC-2, SC-3, SC-4, and clean-up solvents, shall be no more than 240 tons of VOC per 12 consecutive month period. This usage/emission limit, with the estimation that insignificant activities will emit < 10 tons of VOC per year, is required to limit the source's potential to emit VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control devices.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the facilities shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.2.4 Best Available Control Technology (BACT) [326 IAC 8-1-6]

BACT for FRP production units M-1, M-2, M-3, M-4, M-5, M-6, M-7, M-8, M-9, B-1, B-2(a), B-2(b) N-3(a), N-3(b) and Binks115 touch up areas, shall be the following:

(a) The use of styrene-containing resins and gel coats shall be limited such that the potential to emit (PTE) VOC from the FRP units shall be less than 240 tons per twelve (12) consecutive month period. Compliance with this BACT limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, weight percent content of all monomers that are volatile organic HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference, which is included with this permit: “Unified Emission Factors for Open Molding of Composites”, Composites Fabricators Associations, April 20, 1999. Reciprocators M-2 and M-4 are the only units which qualify to use controlled spray emission factors. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA’s AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(b) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content, % by weight
Production[1] Gel Coat	37
Tooling[2] Gel Coat	45
Production Resin	35
Tooling Resin	43

[1] Production refers to the manufacture of parts.
[2] Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

$$\Sigma\, Em_A \leq \Sigma\,(M_R * E_{Ra}) + \Sigma\,(M_G * E_{Ga})$$

Where:

M_R = Total monthly mass of resins within each resin category
M_G = Total monthly mass of gel coats within each gel coats category

E_{Ra} = Emission factor for each resin based on allowable monomer content **and allowable application method** for each resin category.
E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category

Em_A = Actual monthly emissions from all resins and gelcoats based on material specific emission factors, emission reduction techniques and emission controls

Units: *mass = tons*
emission factor = lbs of monomer/ton of resin or gel coat
emissions = lbs of monomer

(c) Non-atomized spray application technology shall be used to mechanically apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray mechanical applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(d) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is defined as the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(e) A one (1) quart, air atomized spray gun may be used as needed for touch-up purposes only.

(f) The following work practices shall be implemented:

(1) To the extent possible, non-VOC, non-HAP solvents shall be used for cleanup.

(2) For VOC- and/or HAP-containing materials:

(A) Cleanup solvent containers shall be used to transport solvent from drums to work areas.

(B) Cleanup stations shall be designed as closed containers having soft gasketed spring-loaded closures and shall be completely closed when not in use.

(C) Solvent saturated cleanup rags shall be stored, transported, and discarded in containers that are tightly closed.

(D) Spray guns shall be designed to be cleaned without requiring the spraying of solvent into the air.

(E) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be discarded in such a manner that evaporation is minimized.

(3) Storage containers shall be covered when not in use.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.2.4(b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 VOC Emissions

Compliance with Condition D.2.4(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.2.8 Particulate Matter (PM)

Dry filter banks for PM control shall be in operation on vented FRP units at all times the FRP units are in operation. Uncontrolled units shall be operated within a building, which will serve as PM control.

D.2.9 Operator Training

(a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) according to the following schedule:

(1) All personnel hired after the effective date of this rule shall be trained within fifteen (15) days of hiring.

(2) All personnel hired before the effective date of this rule shall be trained or evaluated by a supervisor within thirty (30) days of the effective date of this rule.

(3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(4) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (2) if written documentation that the employee's training is current is provided to the new employer.

(5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

(b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(c) The owner or operator shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.

(d) Records of prior training programs and former personnel are not required to be maintained.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.10 Monitoring

(a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filter banks. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Weekly visible emission notations of the fiberglass facilities' stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(f) Monthly inspections shall be performed of the FRP emissions from the stack and the presence of overspray on the rooftops and the nearby ground, weather permitting. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(g) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(h) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1 and D.2.4, the Permittee shall maintain records in accordance with (1) through (4) below for the fiberglass operations. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.4.

(1) The usage by weight and volatile organic HAP monomer content of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) Method of application and other emission reduction techniques for each resin and gel coat used;

(4) The calculated total volatile organic HAP emissions from resin and gel coat use for each month.

(b) To document compliance with Condition D.2.10, the Permittee shall maintain a log of weekly filter inspections, weekly visible emission notations, monthly overspray inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

D.2.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 and D.2.4(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(kk) A fiberglass reinforced plastic (FRP) cutting facility, identified as 7-1, constructed November 1990, with a maximum production of 0.65 lb. of grinding dust/hour, equipped with a cyclone for dust collection, and exhausting through stack SV-7-1

(ll) Grinder/buffer facilities, identified as M-10, constructed in February 1991, with a maximum capacity of 12 units/hour, equipped with dry filters for control and exhausting through stack SV-M-10

(mm) A woodworking facility, identified as N-4, constructed prior to 1987, with a maximum production capacity of 18.54 lb raw material/hour, equipped with a cyclone for dust collection, and exhausting through stack SV-N4

(nn) A woodworking facility, identified as 5-14, constructed July 25, 1991, with a maximum production capacity of 18.54 lb of raw product/hour equipped with a cyclone for sawdust collection, and exhausting through stack SV-5-14

(oo) A woodworking facility, identified as 1-9, constructed July 25, 1991, with a maximum capacity of 18.54 lb of raw product/hour, equipped with a cyclone for sawdust collection, and exhausting through stack SV-1-9

(pp) A woodworking facility, identified as Fleet Woodworking, consisting of a horizontal table saw, a cut-off saw, a radial arm saw, and a band saw, constructed July 1991, with a maximum production capacity of 504 boards per day, with a small drum cyclone/baghouse within the building for sawdust collecting, and exhausting within the building

Insignificant Activities:

(1) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment, including:

(a) Three stick welding stations, identified as Stick Welding, with a maximum production capacity of 6 pounds of welding stick per hour, with no controls, and exhausting within the building

(b) A four-torch oxyacetylene plasma cutting tool, identified as Fleet Torch, which has a cutting rate of 20 inches per minute, with no controls, and exhausting within the building

(c) Metal Inert Gas (MIG) welding stations, identified as MIG Welding, with a combined maximum production rate of 1080 pounds of welding wire per hour, with no controls and exhausting within the building

(d) Seventy-seven (77) MIG welding stations, sixteen (16) stick welding stations, twenty (20) oxyacetylene units, and a TIG welding station

(2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) Pursuant to CP-039-9080-00103, issued April 3, 1998, the rate of PM emission for Fleet Woodworking shall not exceed 0.58 lb/hr, or 2.5 tons/year, when operating at a maximum production capacity of 504 boards/day. Metal Inert Gas (MIG) welding units, which are listed as insignificant activities in this proposed Part 70 permit, shall not exceed 0.01 lb/hr or 0.04 ton/year when operating at a maximum production capacity of 0.002 tons/day.

(b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the remaining FRP-working and woodworking facilities shall not exceed 2.5 pounds per hour when operating at a maximum process weight rate of 954 pounds per hour, or 0.48 tons per hour.

In summary, particulate matter from the FRP cutting facility 7-1, grinder/buffer M-10, woodworking facilities N-4, 5-14, 1-9, Fleet Woodworking, and all insignificant operations, combined, shall not exceed 13.54 tons/year. The pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.4 Particulate Matter (PM)

The cyclones, filters, and other equipment for PM control shall be in operation at all times that the FRP-working, woodworking, welding and cutting facilities are in operation. Uncontrolled units shall be operated within a building, which will serve as PM control.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.5 Visible Emissions Notations

(a) Visible emission notations of stack exhausts from units 7-1, M-10, N-4, 5-14, 1-9, and those insignificant activities which vent through a stack, shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.6 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.3.7 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements

(a) To document compliance with Condition D.3.5 the Permittee shall maintain records of visible emission notations of stack exhausts from units 7-1, M-10, N-4, 5-14, 1-9, and those insignificant activities which vent through a stack, once per shift.

(b) To document compliance with Condition D.3.6, the Permittee shall maintain records of the results of the inspections required under Condition D.3.6.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(qq) Two waste wood furnaces, each with a wood storage silo, identified as 1-5 and M-12, constructed March 16, 1994, each of which have a maximum heat input capacity of 2.0 MMBtu per hour, and exhausting to stacks SV-1-5 and SV-M-12

(The information describing the processes contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Incinerators [326 IAC 4-2]

The requirement from CP 039-3531-00103, issued on March 16, 1994, that waste wood furnaces 1-5 and M-12 shall not emit more than 0.3 pounds of particulate matter per 1,000 pounds of exhaust gas, corrected to 50% excess air, is not applicable because IDEM, OAQ, has changed its determination of the furnaces, and no longer considers the furnaces to be incinerators. Therefore, the 0.3 lb PM/1000 lb exhaust gas limit is not applicable to the furnaces.

D.4.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Supreme Corporation
Source Address: 16500 County Road 38, Goshen, IN
Mailing Address: P.O. Box 463, Goshen, IN 46526
Part 70 Permit No.: T-039-6046-00103

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

□ Annual Compliance Certification Letter

□ Test Result (specify) _____

□ Report (specify) _____

□ Notification (specify) _____

□ Affidavit (specify) _____

□ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317 - 233 - 5674
Fax: 317 - 233 - 5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Supreme Corporation
Source Address: 16500 County Road 38, Goshen, IN
Mailing Address: P.O. Box 463, Goshen, IN 46526
Part 70 Permit No.: T-039-6046-00103

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Supreme Corporation
Source Address: 16500 County Road 38, Goshen, IN
Mailing Address: P.O. Box 463, Goshen, IN 46526
Part 70 Permit No.: T-039-6046-00103

Facilities: Surface coating and FRP production units, combined

Parameters: **Input VOC** to surface coating units H-1, H-2, H-3, A-1, I-1, I-2, 1-1, 1-2, 1-4, P-6, P-7, GM-2, 1-3, 1-6, 1-7, 1-8, 5-10, 5-12, 5-13, N-2, A-2, N-1, 2-15, SC-1,SC-2, SC-3, SC-4, PW-1, PW-2, and clean-up solvents
+
Actual VOC emissions from all resins and gelcoats, based on input VOC and material specific emission factors, emission reduction techniques and emission controls from FRP production units M-1, M-2, M-4, M-3, M-5, M-9, M-6, M-7, M-8, B-1, B-2(a), B-2(b), N-3(a), N-3(b), Binks 115 areas, M-13(a) and M-13(b)

Limit: 240 tons of VOC per 12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

□ No deviation occurred in this quarter.

□ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Supreme Corporation
Source Address: 16500 County Road 38, Goshen, IN
Mailing Address: P.O. Box 463, Goshen, IN 46526
Part 70 Permit No.: T-039-6046-00103

Facilities: Spray booth I–1 and spray/bake booth I-2, combined, when coating FRP substrates

Parameters: Input VOC

Limit: 80 tons of VOC per 12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

□ No deviation occurred in this quarter.

□ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Supreme Corporation
Source Address: 16500 County Road 38, Goshen, IN
Mailing Address: P.O. Box 463, Goshen, IN 46526
Part 70 Permit No.: T-039-6046-00103

Facility: Glue lamination spray unit 2-15
Parameters: Input VOC
Limit: < 25 tons of VOC per 12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

□ No deviation occurred in this quarter.

□ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Supreme Corporation
Source Address: 16500 County Road 38, Goshen, IN
Mailing Address: P.O. Box 463, Goshen, IN 46526
Part 70 Permit No.: T-039-6046-00103

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ____________________________________

Title/Position: ____________________________________

Date: ____________________________________

Phone: ____________________________________

Attach a signed certification to complete this report.

Attach UEF Table here

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Supreme Corporation
Source Location: 16500 County Rd. 38, Goshen, IN
County: Elkhart
SIC Code: 3713, 3089
Operation Permit No.: T039-6046-00103
Permit Reviewer: B. J. Goldblatt

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Supreme Corporation, relating to the operation of a heavy truck and bus painting and parts manufacturing facility.

Permitted Emission Units and Pollution Control Equipment

The Appendix includes a table which identifies the current building locations of emission units. The source should notify the Indiana Department of Environmental Management (IDEM), OAM, upon moving any unit from its current location to a different building.

The source consists of the following permitted emission units and pollution control devices:

(a) A spray/bake booth, identified as H-1, constructed June 1991, which may coat metal or fiberglass reinforced plastic (FRP) surfaces, with a maximum production capacity of 1.66 units per hour, equipped with a dry filter for particulate matter (PM) control, equipped with a 32,000 acfm exhaust fan, and exhausting to stack SV-H-1

(b) A bake booth, identified as H-4, constructed November 4, 1999, which serves as an additional bake booth for sprayed parts from spray/bake booth H-1, with a rated heat input of 1.2 MMBtu per hour, with no controls, and exhausting to stack SV-H-4

(c) Two spray/bake booths, identified as H-2 and H-3, constructed May 28, 1997, which may coat metal or FRP surfaces, each with a maximum production capacity of 0.375 units per hour, each equipped with dry filters for particulate matter (PM) control, each equipped with a 32,000 acfm exhaust fan, and exhausting to stacks SV-H-2 and SV-H-3

(d) An HVLP paint area, identified as A-1, constructed in June 1991, with a maximum production capacity of 3.1 metal truck rear-end parts per hour, equipped with dry filters for PM control, and exhausting to stack SV-A-1

(e) A base coat booth, identified as I-1, constructed January 6, 1995, which may coat metal or FRP surfaces, with a maximum production capacity of 0.60 units/hour, equipped with a dry filter for PM overspray control, and exhausting to stack SV-I-1

(f) A spray/bake booth, identified as I-2, constructed January 6, 1995, which may coat metal or FRP surfaces, with a maximum production capacity of 0.60 units per hour, and a maximum heat input capacity of 1.0 MMBtu per hour, equipped with water wash scrubbing system for PM overspray control, and exhausting through stack SV-I-2

(g) Two HVLP spray paint areas, identified as 1-1 and 1-2, constructed July 25, 1991, each with a maximum production capacity of 1.33 metal rear parts/hour, each equipped with a dry filter for PM control, and exhausting through stacks SV-1-1 and SV-1-2

(h) An undercoating air assisted spray booth, identified as 1-4, constructed July 25, 1991, with a maximum production capacity of 1.33 metal frames per hour, equipped with a dry filter for PM control, and exhausting through stack SV-1-4

(i) A spray paint booth, identified as P-6, constructed July 25, 1991, with a maximum capacity of 0.88 metal or FRP units/hour, equipped with a dry filter for PM control, and exhausting through stack SV-P-6

(j) A spray paint area, identified as P-7, constructed July 25, 1991, with a maximum capacity of 16.66 metal parts/hour, equipped with a dry filter for PM control, and exhausting through stack SV-P-7

(k) A surface touch-up spray facility, identified as GM-2, constructed in 1987, with a maximum production capacity of 1.33 metal units/hour, with no controls, and exhausting within the building

(l) A spray booth identified as 1-3, constructed in January 1991, with a maximum production capacity of 14 metal units/day, equipped with a dry filter for PM control, and exhausting through stack SV-1-3

(m) A spray area, identified as 1-6, constructed in January 1991, with a maximum production capacity of 1.33 metal units/hour, equipped with no controls, and exhausting within the building

(n) A spray area, identified as 1-7, constructed in January 1991, with a maximum production capacity of 1.33 metal units/hour, with no controls, and exhausting within the building

(o) A portable undercoating station, identified as 1-8, constructed in January 1991, with a maximum production capacity of 14 metal units/day, with no controls, and exhausting within the building

(p) An undercoat air assisted spray booth, identified as 5-10, constructed in August 1985, with a maximum production capacity of 0.55 metal units/hour, equipped with dry filters for PM control, and exhausting through stack SV-5-10

(q) An undercoat air assisted spray booth, identified as 5-12, constructed in August 1985, with a maximum production capacity of 0.55 metal units/hour equipped with a dry filter for PM control, and exhausting through stack SV-5-12

(r) A spray booth, identified as 5-13, constructed in August 1985, with a maximum production capacity of 5 metal units/day, equipped with dry filter banks for PM control, and exhausting through stack SV-5-13

(s) A spray paint area, identified as N-2, constructed in June 1991, with a maximum capacity of 1.11 metal units/hour, equipped with dry filter banks for PM control, and exhausting to stack SV-N-2

(t) A spray undercoating area, identified as A-2, constructed in June 1991, with a maximum capacity of 12 metal units/day, with no emission control, and exhausting within the building

(u) An air assisted undercoating booth, identified as N-1, constructed in June 1991, with a maximum capacity of 1.11 metal units/hour, equipped with a dry filter for PM control, and exhausting to stack SV-N-1

(v) A glue lamination air assisted spray facility, identified as 2-15, constructed July 25, 1991, with a maximum production capacity of 0.687 units per hour, equipped with no controls and exhausting within the building

(w) Four Safety Kleen gun cleaners, each equipped with remote solvent reservoirs, identified as SC-1, SC-2, SC-3, and SC-4, each using a maximum of 5 gallons of solvent per week, with no controls, and exhausting within the building

(x) Clean-up solvent processes for the source, with a maximum total usage of 6.5 gal of solvent per hour

(y) A plastic pultrusion machine, identified as M-1, constructed in February 1991, with a maximum capacity of 3.33 parts/hour, equipped with no controls, and exhausting within the building

(z) A reciprocator, performing gel coating and resin flow coating lamination, identified as M-2, constructed in February 1991, with a maximum production of 4.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-2

(aa) A reciprocator, performing gel coating and resin flow coating lamination, identified as M-4, constructed in February 1991, with a maximum production of 0.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-4

(bb) A portable gelcoat gun, identified as M-3, constructed in February 1991, with a maximum production of 4.67 parts/hour, equipped with a dry filter bank for PM control, and exhausting through stack SV-M-3

(cc) Two portable gelcoat guns, identified as M-5 and M-9, constructed in February 1991, each with a maximum production of 0.67 parts/hour, each equipped with a dry filter bank for PM control, and exhausting through stacks SV-M-5 and SV-M-9

(dd) Three portable chop/resin guns, identified as M-6, M-7, and M-8, constructed in February 1991, each with a maximum production of 0.67 parts/hour, each equipped with a dry filter bank for PM control, and exhausting through stack SV-M-6, SV-M-7, and SV-M-8

(ee) A FRP mold department, identified as B-1, constructed in August 1980, with a maximum capacity of 0.004 molds /hour, with no emission control, and exhausting to stack SV-B-1

(ff) A white resin air assisted spray gun, identified as B-2(a), constructed in August 1990, with a maximum capacity of 0.004 molds/hour, equipped with a dry filter for PM control, and exhausting to stack SV-B-2

(gg) A Tru-green mold repair spray gun, identified as B-2(b), constructed in August 1990, with a maximum capacity of 1.33 parts/hour, equipped with a dry filter for PM control, and exhausting to stack SV-B-2

(hh) Two repair/touch-up FRP facilities, identified as N-3(a) and N-3(b), constructed in August 1987, each with a maximum capacity of 0.888 parts/hour, with no emission control, and exhausting within the building

(ii) Several fiberglass touch-up areas which operate as part of FRP production lines, using Binks 115 guns with no emission controls and exhausting within the buildings

(jj) Two bulk resin tanks, identified as M-13(a) and M-13(b), constructed prior to 1981, each with a maximum capacity of 40,000 gallons, with no emission control and exhausting through safety valves

(kk) A fiberglass reinforced plastic (FRP) cutting facility, identified as 7-1, constructed November 1990, with a maximum production of 0.65 lb. of grinding dust/hour, equipped with a cyclone for dust collection, and exhausting through stack SV-7-1

(ll) Grinder/buffer facilities, identified as M-10, constructed in February 1991, with a maximum capacity of 12 units/hour, equipped with dry filters for control and exhausting through stack SV-M-10

(mm) A woodworking facility, identified as N-4, constructed prior to 1987, with a maximum production capacity of 18.54 lb raw material/hour, equipped with a cyclone for dust collection, and exhausting through stack SV-N4

(nn) A woodworking facility, identified as 5-14, constructed July 25, 1991, with a maximum production capacity of 18.54 lb of raw product/hour equipped with a cyclone for sawdust collection, and exhausting through stack SV-5-14

(oo) A woodworking facility, identified as 1-9, constructed July 25, 1991, with a maximum capacity of 18.54 lb of raw product/hour, equipped with a cyclone for sawdust collection, and exhausting through stack SV-1-9

(pp) A woodworking facility, identified as Fleet Woodworking, consisting of a horizontal table saw, a cut-off saw, a radial arm saw, and a band saw, constructed July 1991, with a maximum production capacity of 504 boards per day, with a small drum cyclone/baghouse within the building for sawdust collecting, and exhausting within the building

(qq) Two waste wood furnaces, each with a wood storage silo, identified as 1-5 and M-12, constructed March 16, 1994, each of which have a maximum heat input capacity of 2.0 MMBtu per hour, and exhausting to stacks SV-1-5 and SV-M-12

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than 10 MM Btu per hour, including:

Twenty-two natural gas-fired radiant heaters, constructed April 3, 1998, each of which have a maximum heat input capacity of 0.1 million British thermal units (MMBtu) per hour, with no controls and exhausting to their respective stacks/vents

(b) Fuel oil-fired combustion sources with heat input equal to or less than 2 MMBtu per hour and firing fuel containing less than 0.5 % sulfur by weight

(c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity of less than or equal to 10,500 gallons

(d) Volatile Organic Compound (VOC)/Hazardous Air Pollutant (HAP) storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons

(e) VOC/HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids

(f) Equipment used exclusively for filling drums, pails, or other packaging containers with lubricating oils, waxes, and greases

(g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings

(h) Machining where an aqueous cutting coolant continuously floods the machining interface

(i) Cleaners and solvents characterized as having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F), the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months

(j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment, including:

(1) Three stick welding stations, identified as Stick Welding, with a maximum production capacity of 6 pounds of welding stick per hour, with no controls, and exhausting within the building

(2) A four-torch oxyacetylene plasma cutting tool, identified as Fleet Torch, which has a cutting rate of 20 inches per minute, with no controls, and exhausting within the building

(3) Metal Inert Gas (MIG) welding stations, identified as MIG Welding, with a combined maximum production rate of 1080 pounds of welding wire per hour, with no controls and exhausting within the building

(k) Infrared cure equipment

(l) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs

(m) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs

(n) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment

(o) Paved and unpaved roads and parking lots with public access

(p) Underground conveyors

(q) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment

(r) Blowdown for compressors

(s) Stationary fire pumps

(t) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations

(u) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C)

(v) Other activities with emissions equal to or less than insignificant thresholds:

(1) A waste oil furnace, identified as GM-1, constructed in 1987, with a maximum heat input capacity of 0.15 MM Btu per hour, exhausting through stack SV-GM1

(2) A two-part block foam vat facility, identified as D-1, constructed in February 1991, with a maximum capacity of 4 buns/hour, with no emission control, and exhausting to stack SV-D-1

(3) A two-part foam press, identified as 5-11, constructed in Nov. 91, and exhausting through stack SV -5-11

(4) A hot-melt glue gun, identified as 5-15, constructed in 1995, which functionally replaces previously permitted adhesive spray units 5-8 and 5-9

(5) Additional hot-melt glue systems

(6) A hot melt rollforming machine

(7) Two Superblue wash systems, identified as M-11a and M-11b, constructed in March 1991, each with a maximum usage of 12 gallons of water-based, non-VOC cleaner per week, equipped with no controls, and exhausting within the building

(8) Caulking operations

Existing Approvals

(a) The source has been operating under Agreed Order A-2234 (a) & (b), issued June 2, 1994, and previous approvals including, but not limited to, the following:

(1) Significant Source Mod. 039-10937-00103, issued on Nov. 9, 1999;

(2) CP 039-9080-00103, issued on April 3, 1998;

(3) CP 039-7321-00103, issued on May 28, 1997;

(4) CP 039-3362-00103, issued on January 6, 1995

(5) CP 039-3531-00103, issued on March 16, 1994

(6) CP 039 00103 Control No. 02114, issued on July 25, 1991

(b) All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(1) Significant Source Mod. 039-10937-00103, issued November 9, 1999

Condition D.1.1: That input VOC to bake booth H-4 and spray/bake booths H-1 H-2 and H-3 shall be limited to less than 40 tons per year.

Reason not incorporated: The permit was issued as a modification to CP 039-7321-00103, which contained a 39 ton/year limit for VOC. The limitation will not be included in the proposed Part 70 permit, as described in **Existing Approvals** (b) (3) below, for CP 039-7321-00103, Condition 12.

(2) CP-039-9080-00103, issued April 3, 1998

Condition D.1.1(a): That any change or modification which may result in actual VOC emissions of 15 pounds of VOC per day from the coatings used for the truck undercoating system shall require prior approval and shall be subject to the requirements of 326 IAC 8-2-9.

Reason not incorporated: Truck undercoating system A-1, constructed in June 1991, was identified as CWOP/OWAP equipment with > 25 tons VOC emissions/year. The enforcement issue was resolved with Agreed Order A-2234 (a) & (b), issued June 2, 1994. A-1 was permitted in CP-039-9080-00103, issued April 3, 1998, as a water-based truck undercoating system. A-1 is currently described as a HVLP paint area using solvent-based coatings which contain 3.49 lbs of VOC/gallon of coating, less water, and has the potential to emit (PTE) 195 lbs of VOC/day and 35.5 tons of VOC per year. It is not known if actual emissions of VOC have exceeded 15 pounds per day. This proposed Part 70 permit will require that A-1 be subject to the requirements of 326 IAC 8-2-9.

Condition D.1.1(b): That any change or modification which may result in potential VOC emissions of 25 tons per year from the caulking operation in this permit shall require prior approval.

Reason not incorporated: Pursuant to 326 IAC 2-7-1 (21), caulking operations are classified as insignificant activities in this proposed Part 70 permit. There are no permit conditions applicable to the insignificant caulking operations.

(3) CP 039-7321-00103, issued May 28, 1997

Condition 12: That input volatile organic compounds (VOC) to spray/bake booths H-1, H-2, and H-3 shall be limited to 39 tons per year.

Reason not incorporated: The 39 ton limit was imposed so that the booths could be quickly constructed, as requested by the source, as a minor modification to an assumed major source. This Title V review included a comprehensive source review and emissions calculations, and has resulted in the source being limited to less than 250 tons of VOC per year. The limitation provides the source with flexibility to distribute allowable VOC emissions among the emission units without specific limits on individual units.

(4) CP 039-3362-00103, issued on January 6, 1995

Condition 6: That usage of VOC in booths I-1 and I-2 shall be limited to 39 tons per 365 day period rolled on a daily basis. Therefore, the Emission Offset Rules, 326 IAC 2-3, will not apply.

Reason not incorporated: The 39 ton limit was imposed for a minor modification to a major source under Emission Offset Rules, 326 IAC 2-3. Elkhart county is currently classified as a maintenance attainment county for ozone, so PSD (Prevention of Significant Deterioration) (326 IAC 2-2) rules will apply. Pursuant to 326 IAC 2-2, this source is a major source. The potential to emit VOC from the entire source shall be limited by this proposed Part 70 Permit to < 250 tons per year so that PSD will not apply.

(5) CP 039-3531-00103, issued on March 16, 1994

Condition: Pursuant to 326 IAC 4-2, waste wood furnaces 1-5 and M-12 shall not emit more than 0.3 pounds of particulate matter per 1,000 pounds of exhaust gas, corrected to 50% excess air.

Reason not incorporated: IDEM, OAM, has changed its determination of the furnaces, and no longer considers the furnaces to be incinerators. Therefore, 326 IAC 4-2 (Incinerators) will not apply.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on June 4, 1996. Additional information was received on February 23, 2000, March 23, 2000, April 28, 2000, May 9, 2000, May 10, 2000, May 15, 2000, and May 16, 2000.

Emission Calculations

See the Appendix of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	greater than 100, less than 250
PM-10	greater than 100
SO_2	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	Potential To Emit (tons/year)
styrene	greater than 10
TOTAL	greater than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) VOC and PM_{10} are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.881
PM-10	0.002
SO_2	0.009
VOC	115.217
CO	0.271
NO_x	0.001
HAP (specify)	not available

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO_2	VOC	CO	NO_X	HAP
H-1, H-2 , H-3, when coating FRP substrates (BACT)	-	-	-	240*	-	-	
I-1, I-2 , when coating FRP substrates (BACT)	-	-	-	80	-	-	-
All FRP production units (BACT)	-	-	-	240**	-	-	-
All emission units (PSD)	-	-	-	240	-	-	-
Entire Source (PSD)	-	-	-	< 250	-	-	-

* PSD limitations prevent the surface coating units from reaching the theoretical BACT limit of 244 tons/year – See Appendix for detailed calculations

** PSD limitations prevent the FRP units from reaching the theoretical BACT limit of 880 tons/year – See Appendix for detailed calculations

The insignificant activities, combined, have been estimated to emit < 10 tons of VOC per year. All emission units, combined, have the limited potential to emit 240 tons of VOC per year. The entire source has the limited potential to emit < 250 tons of VOC per year, so that PSD (326 IAC 2-2) will not apply. The source has the potential to emit, after controls, < 250 tons of PM per year, so PSD is not applicable.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance attainment for ozone.

Federal Rule Applicability

(a) The two bulk resin storage tanks, identified as M-13a and M-13b, constructed after May 18, 1978, and prior to July 23, 1984, are not subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC 12, (40 CFR 60.110 - 60.115 Subpart Ka), due to the tank sizes, which are not greater than 40,000 gallons.

(b) None of the surface coating facilities at the source are subject to the requirements of NSPS (326 IAC 12, 40 CFR 60.390, Subpart MM - Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations) because the facilities do not coat automobiles or trucks rated at or less than 3850 Kg gross vehicle weight.

(c) The four Safety Kleen gun cleaners identified as SC-1, SC-2, SC-3, and SC-4, and the insignificant Superblue wash systems identified as M-11a and M-11b, are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T, due to the use of solvents which do not contain specified halogenated HAP solvents greater than 5 percent by weight.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source submitted Preventive Maintenance Plans (PMPs) on June 4, 1996, for all controlled units except P-6, H-2, and H-3. The submitted PMPs have been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is a potential major source due to its potential to emit 250 or more tons of VOC per year .

The potential to emit VOC from the entire source shall be limited to < 250 tons per year, so that PSD will not apply. The insignificant activities, combined, have been estimated to emit < 10 tons of VOC per year. The potential to emit VOC from all emission units, combined, shall be limited to 240 tons of VOC per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and is located in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (Major Sources of Hazardous Air Pollutants) (New source toxics control)

The source is a major source of HAP as defined in 326 IAC 2-4.1-1, due to its potential to emit a single HAP at a level greater than 10 tons/year and any combination of HAP at a level greater than 25 tons/year. However, since all HAP-emitting units at the source were constructed prior to July 27, 1997, 326 IAC 2-4.1-1 will not apply.

326 IAC 6-3-2 (Process Operations)

(a) The particulate matter (PM) from the surface coating spray units shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Dry filters shall be in operation on all vented units at all times the surface coating units are in operation and the water wash scrubbing system shall be in operation at all times unit I-2 is in operation, in order to comply with this limit.

(b) The particulate matter (PM) from the FRP production spray units shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the FRP units are in operation, in order to comply with this limit.

(c) The particulate matter (PM) from the FRP cutting facility 7-1, grinder/buffer M-10, woodworking facilities N-4, 5-14, 1-9, Fleet Woodworking, and insignificant grinding, machining, welding, and cutting operations, combined, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

(1) Pursuant to CP-039-9080-00103, issued April 3, 1998, using the above equation, the rate of PM emission for Fleet Woodworking shall not exceed 0.58 lb/hr, or 2.5 tons/year, when operating at a maximum production capacity of 504 boards/day. MIG welding, which is listed as an insignificant activity in this proposed Part 70 permit, shall not exceed 0.01 lb/hr or 0.04 ton/year for a maximum production capacity of 0.002 tons/day.

(2) PM emission from the remaining FRP-working and woodworking processes shall not exceed 2.5 lb/hr, or 11 tons/year, when operating at a maximum production capacity of 954 lb/hr, or 0.48 tons/hr, by the following:

$$E = 4.10 (0.48)^{0.67} = 2.5 \text{ lb/hr} = 11 \text{ tons/year}$$

Particulate matter from the FRP cutting facility 7-1, grinder/buffer M-10, woodworking facilities N-4, 5-14, 1-9, Fleet Woodworking, and insignificant operations, combined, shall not exceed 13.54 tons/year, as determined from the sum of process weight limitations of all units by the following equation:

$$\text{Limited PM} = 2.5 + 0.04 + 11 = 13.54 \text{ tons/year}$$

The control devices for insignificant activities, cyclones, cyclone/baghouse, and dry filter shall be in operation at all times the FRP-working and woodworking facilities are in operation, in order to comply with this limit.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Waste wood furnaces 1-5 and M-12 and insignificant waste oil furnace GM1 are not subject to 326 IAC 7-1.1 due to their PTE less than 25 tons/year or 10 tons/hour of SO_2.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

(a) Pursuant to CP-039-7321-00103, issued May 28, 1997, BACT for spray/bake booths H-1, H-2, and H-3, when coating/baking FRP substrates, has been determined to be a combination of the use of high volume low pressure (HVLP) spray equipment and limits on the VOC content of 6.5 pounds of VOC per gallon of coating less water for basecoats and 5.1 pounds of VOC per gallon of coating less water for clearcoats. An exception to these VOC content limitations will be made for government work which requires the use of special coatings.

As shown in detailed emissions calculations in the Appendix, the theoretical BACT limit of 244 tons/year for H-1, H-2, and H-3 was calculated from maximum production capacities for H-1, H-2, and H-3 using BACT coatings of 6.5/5.1. However, the source PSD limitation of 240 tons/year will prevent the units from emitting the theoretical BACT limit of 244 tons/year. Therefore, units H-1, H-2, and H-3 shall be limited by BACT to the source PSD limit of 240 tons of VOC/year. Compliance with the source PSD limit of 240 tons/year will prove compliance with the BACT limit of 240 tons/year. Based on the information submitted by the source and calculations made, the spray booths are in compliance with these requirements.

(b) Pursuant to CP-039-3362-00103, issued January 6, 1995, BACT for spray booths I-1 and I-2, when coating FRP substrates, has been determined to be a combination of the use of high volume low pressure (HVLP) spray equipment and limits on the VOC content of 6.5 pounds of VOC per gallon of coating less water for basecoats and 5.1 pounds of VOC per gallon of coating less water for clearcoats.

The use of coatings shall be limited such that the PTE VOC from booths I-1 and I-2, when coating FRP substrates, shall be less than 80 tons per twelve (12) consecutive month period, as shown in detailed emissions calculations in the Appendix. Based on the information submitted by the source and calculations made, the spray booths are in compliance with these requirements.

(c) Glue lamination spray unit 2-15, constructed following January 1, 1980, has PTE VOC > 25 tons/year. Therefore, VOC emissions from 2-15 shall be limited to less than 25 tons per 12

consecutive month period by limiting input VOC such that:

8.25 lb VOC/gal adhesive * Gal. of adhesive used * (1 ton VOC/2000 lbs VOC) < 25 tons VOC/year

This limitation, based on VOC content of 8.25 lb VOC/gal. of adhesive, will prevent VOC emissions from lamination unit 2-15 being greater than 25 tons per 12 consecutive month period. Therefore, 326 IAC 8-1-6 is not applicable.

(d) Spray unit P-6, which applies coatings to FRP surfaces, was constructed following January 1, 1980 and has the PTE VOC less than 25 tons per year. Therefore, BACT is not applicable to P-6. Should PTE exceed 25 tons of VOC per year, BACT would become applicable.

(e) Pursuant to 326 IAC 8-1-6 (New facilities, general reduction requirement) BACT for FRP production units M-1, M-2, M-3, M-4, M-5, M-6, M-7, M-8, M-9, B-1, B-2(a), B-2(b) N-3(a), N-3(b) and the Binks 115 areas shall be the following:

(1) The use of styrene-containing resins and gel coats shall be limited such that the potential to emit (PTE) VOC from the FRP units shall be less than 240 tons per twelve (12) consecutive month period. Detailed emissions calculations in the Appendix show a theoretical BACT limit of 880 tons/year. However, PSD limitations prevent FRP units from emitting the theoretical BACT limit. Compliance with this 240 tons/12 consecutive month period BACT limit shall be determined based upon the following criteria:

(A) VOC emissions from the application of gel coat and resins shall be calculated as volatile organic HAP emissions. Monthly usage by weight, weight percent content of all monomers that are volatile organic HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(B) The emission factors approved for use by IDEM, OAM shall be taken from the following reference: “Unified Emission Factors for Open Molding of Composites”, Composites Fabricators Associations, April 20, 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA’s AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(2) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content, % by weight
Production[1] Gel Coat	37
Tooling[2] Gel Coat	38
Production Resin	35
Tooling Resin	43

[1] Production refers to the manufacture of parts.

[2] Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAM may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

$$\sum Em_A \leq \sum (M_R * E_{Ra}) + \sum (M_G * E_{Ga})$$

Where:

M_R = Total monthly mass of resins within each resin category
M_G = Total monthly mass of gel coats within each gel coats category

E_{Ra} = Emission factor for each resin based on allowable monomer content and allowable application method for each resin category.
E_{Ga} = Emission factor for each gel coat based on allowable monomer content for each gel coat category

Em_A = Actual monthly emissions from all resins and gelcoats based on material specific emission factors, emission reduction techniques and emission controls

Units: *mass = tons*
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

(3) Non-atomized spray application technology shall be used to mechanically apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray mechanical applications of a design and specifications approved by IDEM, OAM.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(4) Optimized spray techniques according to a manner approved by IDEM, OAM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is defined as the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(5) A one (1) quart, air atomized spray gun may be used as needed for touch-up purposes only.

(6) The following work practices shall be implemented:

(A) To the extent possible, non-VOC, non-HAP solvents shall be used for cleanup.

(B) For VOC- and/or HAP-containing materials:

(i) Cleanup solvent containers shall be used to transport solvent from drums to work areas.

(ii) Cleanup stations shall be designed as closed containers having soft gasketed spring-loaded closures and shall be completely closed when not in use.

(iii) Solvent saturated cleanup rags shall be stored, transported, and discarded in containers that are tightly closed.

(iv) Spray guns shall be designed to be cleaned without requiring the spraying of solvent into the air.

(v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be discarded in such a manner that evaporation is minimized.

(C) Storage containers shall be covered when not in use.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating)

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating) does not apply to this source because the gross weight of the coated trucks exceeds 8,500 pounds.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings delivered to the applicators at spray booths/areas H-1, H-2, H-3, I-1, I-2, A-1, 1-1, 1-2, 1-4, P-6, P-7, GM-2, 1-3, 1-6, 1-7, 1-8, 5-10, 5-12, 5-13, N-2, A-2, and N-1, when applied to metal surfaces, shall be limited to 4.3 pounds of VOCs per gallon of coating less water for clear coatings, and 3.5 pounds of VOCs per gallon of coating less water for non-clear air dried or forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booths are in compliance with this requirement.

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to Source Modification 039-10937-00103, the two Safety Kleen gun cleaners SC-2 and SC-3 are subject to 326 IAC 8-3-2. Safety Kleen cleaners SC-1 and SC-4 are also subject to 326 IAC 8-3-2. The owner or operator shall:

(a) Equip the cleaners with a cover;

(b) Equip the cleaners with a facility for draining cleaned parts;

(c) Close the degreaser covers whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

Units SC-1, SC-2, SC-3, and SC-4 are not subject to 326 IAC 8-3-5 due to their remote solvent reservoir components. 326 IAC 8-3-1(b)(1)(A) describes applicability of 326 IAC 8-3-5 for cold cleaner degreasers without remote solvent reservoirs.

326 IAC 8-6 (Organic Solvent Emission Limitations)

None of the facilities at this source are subject to 326 IAC 8-6, because they were constructed following the applicable period of October 7, 1974 through December 31, 1979.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The spray surface coating units have applicable compliance monitoring conditions as specified below:

(1) Dry Filters: Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while each of the booths is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Water Wash Scrubbing System: Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle

panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from I-2 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(2) Weekly visible emission notations of the surface coating stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(3) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(4) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(5) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(6) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(7) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the filters and water wash scrubbers must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

(b) The FRP production spray units have applicable compliance monitoring conditions as specified below:

(1) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filter banks. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(2) Weekly visible emission notations of the FRP facilities' stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(3) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(4) In the case of batch or discontinuous operations, readings shall be taken during that

part of the operation that would normally be expected to cause the greatest emissions.

(5) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(6) Monthly inspections shall be performed of the FRP emissions from the stack and the presence of overspray on the rooftops and the nearby ground, weather permitting. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) The FRP-working and woodworking units 7-1, M-10, N-4, 5-14, 1-9, and insignificant grinding and machining operations have applicable compliance monitoring conditions as specified below:

(1) Daily visible emission notations of units 7-1, M-10, N-4, 5-14, and 1-9 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(4) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(5) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(6) An inspection shall be performed each calender quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

(7) In the event that cyclone failure has been observed, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Conclusion

The operation of this a truck and bus painting and parts manufacturing facility shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-6046-00103**.

Appendix

Current Building Locations of Emission Units

Surface Coating Operations - Potential to Emit VOC and PM under Worst Case Conditions; Theoretical BACT limited PTE

Fiberglass (FRP) Production Operations - Potential to Emit VOC and PM under Worst Case Conditions; Theoretical BACT limited PTE

Waste Wood Furnaces Emissions

Current Building Locations of Emission Units

The source should notify IDEM, OAM, upon moving any unit from its current location to another building.

Building	Emission Units
1	**1-1 1-2 1-4 1-6 1-7** spray areas **1-5** waste wood furnace **1-9** woodworking
2	**2-15** glue lamination spray **Insig.** hot melt glue machines(2)
5	**5-11** Insignificant foam press **Insig.** rollforming/flowcoating gluing **5-13** paint booth **5-15** insignificant hot melt glue gun **5-14** woodworking
7	**P-6 P-7** spray areas **S**afety Kleen gun cleaner **Insig.** FRP touch-up
8	**1-3 5-10 5-12** paint booths **H-1 H-2 H-3** spray/bake booths **H-4** bake booth **S**afety Kleen gun cleaner
9	**GM-2** touch-up spray
B	**B-1** mold department **B-2(b)** mold repair gun **B-2(a)** resin gun
D	**N-3(a) N-3(b)** FRP touch-up **D-1** insignificant bun foam vat
H	**N-2** spray area
I	**I-1 I-2** spray booths **S**afety Kleen gun cleaner
M	**M-1** pultrusion **M-10** grinder/buffer **M-2 M-4** reciprocators **M-11a & b** Insig. Superblue wash systems **M-3 M-5 M-9** gelcoat guns **M-12** waste wood furnace **M-6 M-7 M-8** chop/resin guns **M-13(a) M-13(b)** resin tanks
N	**N-1** undercoating booth **N-4** woodworking facility
P	**7-1** FRP cutting facility **Insig.** FRP touch-up
R	**Fleet Woodworking** *(**A-1 and A-2** may soon be installed here)*
(variable)	**1-8** portable undercoating station
storage	**A-1** HVLP spray area **A-2** undercoating

Insert Spreadsheet, Notebook A here.

Insert Spreadsheet, Notebook B here.

Insert Spreadsheet, Notebook C here.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name: Supreme Corporation
Source Location: 16500 County Road 38, Goshen, IN
County: Elkhart
SIC Codes: 3713, 3089
Operation Permit No.: T 039 - 6046 - 00103
Permit Reviewer: B. J. Goldblatt

On Aug 1, 2000, the Office of Air Management (OAM) arranged for a notice to be published in the Elkhart Truth, Elkhart, Indiana, stating that Supreme Corporation had applied for a Part 70 Operating Permit to operate a heavy truck and bus painting and parts manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The Office of Air Management (OAM) was recently given the new name of Office of Air Quality (OAQ). Name changes will not be noted with BOLD and "line through" formatting in this Addendum, but the issued permit will reflect such changes.

The OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been altered accordingly.

1. Title Page

Supreme Corporation
~~P.O. Box 463~~ 16500 County Road 38
Goshen, Indiana ~~46526~~ 46528

2. The following changes were made to Section A.1 and reflected in all reporting forms.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary heavy truck and bus painting and parts manufacturing plant.

Responsible Official: Omer Kropf, President
Source Address: 16500 County Road 38, Goshen, IN **46528**
Mailing Address: P. O. Box 463, ~~Elkhart~~ Goshen, IN ~~46515-0349~~ **46526**

3. The following deletion of Condition B.1 has resulted in a numbering shift , i.e. B.x-1, to the remaining B Conditions.

~~B.1 Permit No Defense [IC 13]~~

~~(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~

~~(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."~~

4. The following changes were made to Condition B.11(c)(3), which is now B.10(c)(3):

(3) Whether compliance was ~~based on~~ continuous or intermittent ~~data~~;

5. The following change has been made to Condition B.13(b)(5), which is now B.12(b)(5):

(5) For each emergency lasting one (1) hour or more, the Permittee submitted **the attached Emergency Occurrence Report Form or its equivalent** ~~notice~~, either ~~in writing~~ **by mail** or facsimile~~, of the emergency~~ to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

6. The following changes have been made to Condition B.14:

~~B.14~~ **B.13** Permit Shield [326 IAC 2-7-15] **[326 IAC 2-7-20] [326 IAC 2-7-12]**

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. **The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.**

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, ~~including any term or condition from a previously issued construction or operation permit,~~ IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

7. The following changes have been made to Condition B.16:

~~B.16~~ **B.15** Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance ~~Branch~~ **Data Section**, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation~~ **using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent.** ~~except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~ **Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.**

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~(3)~~**(2)** Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) **Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.**

~~(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

8. The Emergency/Deviation Report and Compliance Monitoring Report have been altered to incorporate Condition B.15 changes, which are described in above Revision #7.

9. The following changes have been made to Condition B.19:

~~B.19~~ **B.18** Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) ~~only if a certification is required by the terms of the applicable rule~~.

10. The following changes have been made to Condition B.24:

~~B.24~~ **B.23** Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee ~~does not~~ require**s** the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

11. The following changes have been made to Condition C.18:

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit~~ The source shall submit ~~a~~ **the attached** ~~Semi-Annual~~ **Quarterly Deviation and** Compliance Monitoring Report **or its equivalent**. Any deviation from ~~the~~ **permit** requirements, ~~and~~, the date(s) of each deviation**, the cause of the deviation, and the response steps taken** must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period.** The **Quarterly Deviation and** Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly ~~or semi-annual~~ report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports ~~do not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

~~(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~

~~(g)~~**(e)** The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

12. The following changes were made to Condition D.1.6:

D.1.6 Miscellaneous Metal Coating [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings delivered to the applicators at spray booths/areas H-1, H-2, H-3, I-1, I-2, A-1, 1-1, 1-2, 1-4, P-6, P-7, GM-2, 1-3, 1-6, 1-7, 1-8, 5-10, 5-12, 5-13, N-2, A-2, and N-1, when applied to metal surfaces, shall be limited to 4.3 pounds of VOC per gallon of coating less water for clear coatings, and 3.5 pounds of VOC per gallon of coating less water for ~~non-clear~~ air dried, ~~or~~ forced warm air dried **or extreme performance** coatings. **If more than one emission limitation applies to a specific coating, then the least stringent emission limitation shall be applied.**

13. The following changes were made to Conditions D.1.14 and D.2.11 to require that reporting forms be submitted by a "responsible official", and Quarterly Report Forms have been changed to reflect the need for certification. Condition D.2.11 was changed to D.2.12 due to Response to Comment #10 in this Addendum.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.5 (c), (d), and (e), shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee ~~does not~~ require**s** the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

~~D.2.11~~ **D.2.12** Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 and D.2.4(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee ~~does not~~ require**s** the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

14. The following Condition D.4.2 was added to Emission Limitations and Standards of Section D.4. It is noted in this TSD addendum that the two waste wood furnaces, 1-5 and M-12, are not subject to 326 IAC 6-2, because they are not sources of indirect heating.

D.4.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

15. The following change was made to the Quarterly Reporting Form for PSD, to clarify how input VOC is limited for FRP units.

Parameters: Input VOC to surface coating units H-1, H-2, H-3, A-1, I-1, I-2, 1-1, 1-2, 1-4, P-6, P-7, GM-2, 1-3, 1-6, 1-7, 1-8, 5-10, 5-12, 5-13, N-2, A-2, N-1, 2-15, SC-1,SC-2, SC-3, SC-4, PW-1, PW-2, and clean-up solvents
+
Actual VOC emissions from all resins and gelcoats, based on **input VOC and** material specific emission factors, emission reduction techniques and emission controls from FRP production units M-1, M-2, M-4, M-3, M-5, M-9, M-6, M-7, M-8, B-1, B-2(a), B-2(b), N-3(a), N-3(b), Binks 115 areas, M-13(a) and M-13(b)

On September 1, 2000, Supreme Corporation submitted comments on the proposed Part 70 permit. Supreme's quoted comments follow:

Comment #1:

"Section A.3 Specifically Regulated insignificant Activities" and
"Section D.3 Facility Operations--Insignificant Activities"

"In this section you have itemized welding, brazing, cutting, equipment for the R fleet building only. Attached is a copy of the application showing that prior to the R building being added, Supreme Corporation had 16 stick welders, 77 MIG welding stations, 1 TIG welding station and 20 Oxyacetylene cutting stations located throughout the complex. You will need to add these to the already listed quantities."

Response # 1:

The following change has been made to Sections A.3 (1) and D.3 - Facility Description - Insignificant Activities (1):

(D) or (d) Seventy-seven (77) MIG welding stations, sixteen (16) stick welding stations, twenty (20) oxyacetylene units, and a TIG welding station

Comment #2

"Section B.12 Preventative Maintenance Plans

Preventative maintenance plans are only required for pollution control devices. PMP's were submitted on June 4, 1996 for all particulate control devices, cyclones, and water wash systems. The TSD page 10 of 23 under State Rule Applicability notes that PMP's were submitted for all controlled units except P-6, H-2 and H-3. Preventative maintenance plans for P-6 were combined with P-7 because they are part of the same building. The top of the PMP states that it is for both P-6 and P-7. The preventative maintenance plans for H-2 and H-3 were submitted in the title five application package even though at the time of submittal, construction permits had not been issued. The permit should be modified to state that all PMP's were submitted on June 4, 1996.**"**

Response # 2:

Pursuant to 326 IAC 2-7-5(1),(3),(13), 326 IAC 2-7-6(1),(6) and 326 IAC 1-6-3, PMPs are required for all permitted facilities when specified in Section D. If lack of proper maintenance could cause or contribute to a violation of any limitation on emissions or potential to emit, then a Preventive Maintenance Plan will be required even if there is no control device. In some cases, the PMP for a pollution control device can meet the requirements for a PMP for the facility. It is noted here that the preventive maintenance plan (PMP) for P-6 has been submitted as identical to the PMP for P-7. OAQ does not have a record of the PMP for H-2 and H-3, and since the source has not provided H-2 and H-3 PMPs with its comments to the draft permit, the PMPs for H-2 and H-3 will need to be submitted according to the requirements of final permit Condition B.11, Preventive Maintenance Plans. No changes have been made in the permit as a result of Comment #2.

Comment #3

"Section B13 Emergency Provisions

This section should be removed. It is unduly burdensome, unnecessary, and not authorized under 326 IAC 2-7-5(3)(C). 326 IAC 2-7-16 covers emergencies lasting more than one hour, requires notification within four daytime business hours and a written follow-up within two business days. These requirements fulfill the requirements of 326 IAC 2-7-5(3)(C)(ii). 326 IAC 2-7-5(3)(C)(i) and (ii) require all other deviations to be reported in the monitoring reports to be submitted "at least every six months". There is nothing in these provisions, or in any other provision of 326 IAC 2-7, which requires or justifies a requirement for interim reporting of deviations which do not constitute emergencies. Section B13 merely creates unnecessary and duplicative paperwork."

Response # 3:

326 IAC 2-7-5 (3) (C) and 326 IAC 2-7-16 are related to quite different situations, most notably compliance deviations which occur during normal operations and deviations which occur during emergency conditions.

The reporting requirements described in the two rules are, appropriately, different. IDEM, OAQ, has changed the standard permit language for Section B.13 and B.16, as described in above Revisions 5 and 7, and those changes also address some of the concerns in this comment.

Comment #4

"Section C.12 Emergency Reduction Plans

Supreme Corporation submitted their emergency reduction plan on June 4, 1996. This ERP was included in the Title V permit application package. Please note in this section that an ERP was submitted."

Response # 4:

Supreme submitted an ERP on Dec. 30, 1996, as an addition to the Title V application. Supreme may wish to update the document to include current contact people and phone numbers. The following changes have been made to Condition C.12:

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) ~~The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~

The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 30, 1996.

(b) ~~These ERPs shall be submitted for approval to:~~

~~Indiana Department of Environmental Management~~
~~Compliance Branch, Office of Air Quality~~
~~100 North Senate Avenue, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~within ninety (90) days after the date of issuance of this permit.~~

~~The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(c)~~ If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

~~(d)~~ **(c)** These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

~~(e)~~ **(d)** Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

~~(f)~~ **(e)** Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

Comment # 5

"Section C14 Compliance Monitoring Plans

Item (5) Compliance Response Plans are duplicative. You are required to implement reasonable steps in the compliance monitoring plan CRP's create unnecessary, and burdensome paperwork."

Response # 5:

There is sufficient authority for requiring a Compliance Response Plan as part of a Compliance Monitoring Plan. 326 IAC 2-7-5(1) requires that all Title V permits contain operational requirements and limitations that assure compliance with all applicable requirements. 326 IAC 2-7-5(3) requires that all Title V permits contain monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. 326 IAC 2-7-5(3)(A)(ii) requires that, at a minimum, the periodic monitoring requirements must be sufficient to yield reliable data from the relevant time period that are representative of the source=s compliance, even where the applicable requirement does not require periodic testing or instrumental monitoring.

Furthermore, the Compliance Response Plan (CRP) is part of the overall Compliance Monitoring Plan (CMP). The CMP calls for two types of maintenance: preventive maintenance and corrective maintenance. The OAQ received many comments from the regulated community regarding the previous version of the CMP, which included preventive and corrective maintenance in the same document, the Preventive Maintenance Plan (PMP). These comments requested that the OAQ split the PMP into two plans: one for preventive maintenance and one for corrective maintenance. Therefore, the OAQ responded by splitting the preventive maintenance and the corrective maintenance into the PMP and CRP, respectively. The requirement that the permit contain operational requirements and limitations that assure compliance with all applicable requirements, coupled with the rule requirements for compliance monitoring, provides all the necessary authority for this permit requirement. Therefore, the IDEM disagrees with your position that the CRP be eliminated from the above mentioned condition.

No changes were made in the permit as a result of Comment #5.

Comment #6

"Section C.16 Emission Statements

It has recently been rumored that IDEM might be amending its rule 2-6 on due dates of annual emission statements based on the fact several Indiana Counties are no longer in non-attainment classifications. We suggest that you Delete "April 15 of each year" and substitute with "the applicable due date."

Response # 6:

The following changes have been made to Condition C.16:

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by ~~April 15 of~~ **the applicable due date** each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) ~~The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30.~~ The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment #7

"Section D 1.7 Volatile Organic Compounds

Subsection (a) These gun cleaners are designed without covers as the spray gun equipment connects to a solvent spout for gun flushing. It would be impossible to install a cover on these remote solvent reservoirs. The systems are designed to recycle the solvent as solvent is being used."

Response # 7:

The recycling system can be broadly interpreted as a cover, because the closed system does not allow for solvent evaporation when the units are not in use. To allow for the parts washers' effective design, the following changes have been made in the permit as a result of Comment #7.

D.1.7 Volatile Organic Compounds (VOC)

Pursuant to Source Modification 039-10937-00103, issued Nov. 9, 1999, and 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of Safety Kleen cleaners SC-1, SC-2, SC-3, and SC-4, and parts washers PW-1 and PW-2, shall:

(a) Equip the cleaners with a cover**, or with a closed solvent recycling system which prevents solvent evaporation in much the same way as a cover prevents evaporation**;

(b) Equip the cleaners with a facility for draining cleaned parts;

(c) Close the degreaser covers**, or keep solvent within the closed recycling system,** whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Comment #8

"Section A2 and D 1 Identification of facility operations

These sections do include the safety kleen gun cleaning systems but do not however include the two parts washers used on site. One is located in the garage and the other is located in the Fleets building."

Response # 8:

The following addition of (rr) has been made to Section A.2 and the Facility Description in Section D.1; the following changes have been made to Sections D.1.1 and D.1. 7; and the Quarterly Reporting form has been adjusted to include the two parts washers.

(rr) Two parts washers, each equipped with remote solvent reservoirs, identified as PW-1 and PW-2, each using a maximum of 5 gallons of solvent per week, with no controls, and exhausting within the building

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

VOC usage from surface coating units H-1, H-2, H-3, A-1, I-1, I-2, 1-1, 1-2, 1-4, P-6, P-7, GM-2, 1-3, 1-6, 1-7, 1-8, 5-10, 5-12, 5-13, N-2, A-2, N-1, 2-15, cleaners SC-1,SC-2, SC-3, SC-4, **PW-1, PW-2**, and clean-up solvents, combined with VOC emissions from units M-1, M-2, M-4, M-3, M-5, M-9, M-6, M-7, M-8, B-1, B-2(a), B-2(b), N-3(a), N-3(b), Binks 115 areas, M-13(a) and M-13(b), shall be no more than 240 tons of VOC per 12 consecutive month period. This usage/emission limit, with the estimation that insignificant activities will emit < 10 tons of VOC per year, is required to limit the source's potential to emit VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.7 Volatile Organic Compounds (VOC)

Pursuant to Source Modification 039-10937-00103**, issued Nov. 9, 1999** and 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of Safety Kleen cleaners SC-1, SC-2, SC-3, and SC-4, **and parts washers PW-1 and PW-2,** shall:

Comment #9

"section D 1.12 (b)

Item (b) addresses specifically the water wash system located in the I-2 spraybake booth. The system has been modified to used dry filter media only. The water wash system is no longer in use because it is not necessary with the down draft dry filter system already in existence. The permit should be modified to state this."

Response # 9:

The following changes have been made to Condition A.2 (f) and the Facility Description in Section D.1:

(f) A spray/bake booth, identified as I-2, constructed January 6, 1995, which may coat metal or FRP surfaces, with a maximum production capacity of 0.60 units per hour, and a maximum heat input capacity of 1.0 MMBtu per hour, equipped with ~~water wash scrubbing system~~ **a down draft dry filter system** for PM overspray control, and exhausting through stack SV-I-2

The following changes have been made to Section D.1.12:

D.1.12 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle

loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from each of the surface coating booth stacks while the corresponding booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

~~(b) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from stack SV-I-2 while booth I-2 is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(c) Weekly visible emission notations of the surface coating stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

~~(d) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(e) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(f) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(g)~~ **(b)** Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

~~(h)~~ **(c)** Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Comment #10

"Section D 2.4 BACT

Item (2) The permit states that Supreme should use the CFA emission factors for Open molding with the exception of the emission factors for controlled spray. Supreme's flat panel and bus roof area utilize reciprocators that have already been deemed a pollution prevention control because they are mechanically/robotically driven and spray the same amount of monomer each time to a designated area. Overspray is limited and the parts are covered with plywood and a vacuum bag is placed for final cure

out. CFA has factors for this process. IDEM as already incorporated controlled spray allowance in permits for FabWell Composites and Global Glass, Inc. Supreme should also be included in this process technology.

Item (b) The Hap monomer table is not consistent with Federal EPA proposed MACT for Tooling Gelcoats. Currently IDEM's proposed rule allows for 45% styrene monomer content in tooling gelcoats. This table should be modified to reflect the most recent proposals."

Response # 10:

Condition D.2.4(a)(2) has been revised to indicate current applicable emission factors. Unified Emission Factors for Open Molding of Composites may be used to determine controlled spray emissions from the mechanically/robotically driven reciprocators.

Condition D.2.4(b) has been changed to show a 45% monomer limit for tooling gelcoats. The higher limit of 45% is included in the styrene rule which was final adopted by the Indiana Air Pollution Control Board on October 4, 2000. The rule also includes a requirement for operator training for spray applications, because properly sprayed resins and gelcoats emit fewer VOC/HAP than those that are improperly sprayed. The requirement for operator training has been added to Compliance Determination as Condition 2.9, and previous Conditions D.2.9, D.2.10 and D.2.11 have become Conditions D.2.10, D.2.11, and D.2.12.

D.2.4 Best Available Control Technology (BACT) [326 IAC 8-1-6]

BACT for FRP production units M-1, M-2, M-3, M-4, M-5, M-6, M-7, M-8, M-9, B-1, B-2(a), B-2(b) N-3(a), N-3(b) and Binks115 touch up areas, shall be the following:

(a) The use of styrene-containing resins and gel coats shall be limited such that the potential to emit (PTE) VOC from the FRP units shall be less than 240 tons per twelve (12) consecutive month period. Compliance with this BACT limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, weight percent content of all monomers that are volatile organic HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference, **which is included with this permit**: "Unified Emission Factors for Open Molding of Composites", Composites Fabricators Associations, April 20, 1999~~, with the exception of the emission factors for controlled spray application~~. ~~This reference is included with this permit~~. **Reciprocators M-2 and M-4 are the only units which qualify to use controlled spray emission factors.** For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(b) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content, % by weight
Production[1] Gel Coat	37

Tooling[2] Gel Coat	~~38~~ **45**
Production Resin	35
Tooling Resin	43

[1] Production refers to the manufacture of parts.
[2] Tooling refers to the manufacture of the molds from which parts are manufactured.

Compliance Determination

D.2.9 Operator Training

(a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) according to the following schedule:

(1) All personnel hired after the effective date of this rule shall be trained within fifteen (15) days of hiring.

(2) All personnel hired before the effective date of this rule shall be trained or evaluated by a supervisor within thirty (30) days of the effective date of this rule.

(3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(4) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (2) if written documentation that the employee's training is current is provided to the new employer.

(5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

(b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(c) The owner or operator shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.

(d) Records of prior training programs and former personnel are not required to be maintained.

Potential to Emit - Worst Case VOC and PM
and Limited Potential to Emit VOC during maximum production, per BACT
Fiberglass Operations

Company Name: **Supreme Corporation** Reviewer: B.J. Goldblatt
Address City IN Zip: **Goshen, IN** Date: May 2000
Permit: **T039-6046-00103**

Emission Unit	Material	Density (lb material/Gal material)	Weight % Monomer or VOC	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF1 (lbs monomer/ton material)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	Transfer Efficiency	Potential PM (tons/ yr)	BACT Limited Monomer Content (%)	UEF2 (lbs monomer/ton material)	Theoretical BACT Limit (tons/yr)
M-1	53384D	9.7	29.90%	5.00	3.330	12	23.26	4.24	100%	0.00	35%	14	4.95
	Catalyst DDM 9	8.0	76.00%	0.29	3.330	N/A	140.91	25.72	100%	0.00	N/A	N/A	0.00
M-2	040-4369	9.1	35.33%	11.00	4.670	78	437.55	79.85	100%	0.00	35%	77	78.83
	5776W90269	10.8	35.00%	4.32	4.670	336	878.51	160.33	100%	0.00	37%	377	179.89
	Catalyst DDM 9	8.0	76.00%	0.88	4.670	N/A	596.27	108.82	100%	0.00	N/A	N/A	0.00
M-4	040-4369	9.1	35.33%	11.00	0.670	78	62.77	11.46	100%	0.00	35%	77	11.31
	5776W90269	10.8	35.00%	4.32	0.670	336	126.04	23.00	100%	0.00	37%	377	25.81
	Catalyst DDM 9	8.0	76.00%	0.88	0.670	N/A	85.55	15.61	100%	0.00	N/A	N/A	0.00
M-3	5776W90269	10.8	35.00%	4.32	4.670	336	878.51	160.33	75%	155.08	37%	377	179.89
M-5	5776W90269	10.8	35.00%	4.32	0.670	336	126.04	23.00	75%	22.25	37%	377	25.81
M-9	944WT140	10.8	37.00%	6.50	0.670	377	212.78	38.83	75%	32.45	37%	377	38.83
M-6	040-4369	9.1	35.30%	21.50	0.670	144	226.52	41.34	85%	55.72	35%	140	40.19
	Catalyst DDM 9	8.0	76.00%	1.23	0.670	N/A	120.25	21.95	85%	1.04	N/A	N/A	0.00
M-7	040-4369	9.1	35.30%	21.50	0.670	144	226.52	41.34	85%	55.72	35%	140	40.19
	Catalyst DDM 9	8.0	76.00%	1.23	0.670	N/A	120.25	21.95	85%	1.04	N/A	N/A	0.00
M-8	040-4369	9.1	35.30%	21.50	0.670	144	226.52	41.34	85%	55.72	35%	140	40.19
	Catalyst DDM 9	8.0	76.00%	1.23	0.670	N/A	120.25	21.95	85%	1.04	N/A	N/A	0.00
B-1	E-704-FD	9.1	50.00%	5.00	0.004	354	0.77	0.14	75%	0.10	35%	140	0.06
B-2(a)	E-704-FD	9.1	50.00%	55.00	0.004	354	8.50	1.55	85%	0.66	35%	140	0.61
B-2(b)	040-4369	9.1	35.30%	55.00	1.330	144	1150.27	209.92	75%	471.60	35%	140	204.09
N-3(a)	5776W90269	10.8	35.00%	0.63	0.888	336	24.36	4.45	75%	4.30	37%	377	4.99
	Catalyst DDM 9	8.0	76.00%	0.04	0.880	N/A	5.14	0.94	75%	0.07	N/A	N/A	0.00
N-3(b)	5776W90269	10.8	35.00%	0.63	0.888	336	24.17	4.41	75%	4.27	37%	377	4.95
	Catalyst DDM 9	8.0	76.00%	0.04	0.880	N/A	5.14	0.94	75%	0.07	N/A	N/A	0.00
							Total	**1063.40**		**861.13**			* **880.60**

Insignificant D-1 foam vat facility emits negligible amounts of any regulated air pollutant. ***PSD limitations will prevent units from reaching the theoretical BACT limit total**

N/A = not applicable
UEF1 is based upon the weight % monomer of each resin and gelcoat
UEF2 is based upon the BACT limited % monomer of each resin and gelcoat

UEF1and UEF2 for units M-2, M-4, M-3, M-5, M-9, M-6, M-7, M-8, B-1, B-2,and N-3 were determined from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999.

UEF1 for unit M-1 was determined from AP-42 Table 4.4-2 , Jan. 95, = 2% for closed molding * 29.9% *2000lbs of monomer/ton of resin= 12

UEF2 for unit M-1 was determined from AP-42 Table 4.4-2 , Jan. 95, = 2% for closed molding * 35 % * 2000lbs of monomer/ton of resin = 14

Potential VOC (lb/day) for resins and gels = Density * Gal. of material * Maximum usage * UEF1 * 24 hrs/day * ton of material/2000 lbs of material

Potential VOC (lb/day) for catalysts = Density * Weight % Monomer or VOC * Gal of material * Maximum usage * 24 hours

Potential VOC (ton/year) = Potential VOC (lb/day) * 365 days/year * (1 ton/2000 lb)

Potential PM (ton/year) = Density * (1 - Weight % monomer or VOC) * Gal. of Material * Maximum Usage * (1 - transfer efficiency) * 24 hrs/day * 365 days/year * (1 ton/2000 lb)

Theoretical BACT Limit = Density*Gal. of Material*Max. Usage*UEF2*8760hr/yr*1ton monomer /2000lbs monomer * 1 ton of material/2000 lbs of material